

HUSCH BLACKWELL

Jenna M. Stupar
Attorney

120 South Riverside Plaza, Suite 2200
Chicago, IL 60606-3912
Direct: 312.526.1590
Fax: 312.655.1501
jenna.stupar@huschblackwell.com

July 18, 2016

CERTIFIED MAIL

Regional Freedom of Information Officer
U.S. EPA, Region 3
1650 Arch Street
(3CG00)
Philadelphia, PA 19103

Re: FOIA Request for Records Relating to Dr. Richard DeGrandchamp

Dear Sir or Ma'am:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, please forward to my attention any and all documents and information relating to the investigations involving Dr. Richard DeGrandchamp including the following:

- *US v. Union Corp.; Metal Bank of Am., et al. v. Consolidated Edison, et al*, 259 F. Supp. 3d 356 (E.D. Pa. 2003) (No. 80-1589) (memo. issued January 21, 2003)
 - Department of Justice attorneys: Eric Williams, Catherine Malinin Dunn, John Sither, & Nadine Overton.

This request includes the following categories of information:

1. transcripts of hearings depositions, and trial testimony of Dr. DeGrandchamp;
2. statements, declarations, and affidavits of Dr. DeGrandchamp;
3. draft and final reports – including progress reports, consultant reports, and expert reports authored by Dr. DeGrandchamp;
4. draft and final protocols involving Dr. DeGrandchamp's work;

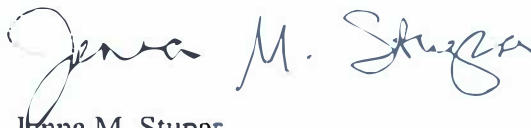
FOIA Request for Records Relating to Dr. Richard DeGrandchamp

5. communications including letters, emails, and phone records – to / from Dr. DeGrandchamp and when he was copied;
6. invoices and bills related to Dr. DeGrandchamp's work;
7. photographs and videos pertaining to Dr. DeGrandchamp's testimony or work;
8. documentation of site visits and inspections;
9. internal memoranda, emails, and correspondence pertaining to the government's decision to retain Dr. DeGrandchamp.

To the extent these documents are available on CD or electronically, I prefer to receive them in that format. If costs associated with this request will exceed \$500.00, please notify me with an estimate; I will promptly respond regarding incurring the additional costs.

Thank you in advance. If you have any questions or concerns, please contact me via e-mail or via telephone at (312-526-1590).

Sincerely,

A handwritten signature in blue ink that reads "Jenna M. Stupar". To the right of the signature is a small, stylized blue mark that looks like a checkmark or the letters "VS".

Jenna M. Stupar
Attorney

JMS